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FILED.

DATED: 4:34 pm, March 16, 2023

U.S. MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ADRIEN TYRIE MACKLIN-HICKS,  
aka "Drae"

Defendant.

**Case No. 2:23-mj-00219-DJA**

**COMPLAINT**

**VIOLATIONS:**

18 U.S.C. §§ 922(a)(1)(A) and  
924(a)(1)(D) – Engaging in the Business  
of Dealing or Manufacturing Firearms  
Without a License

18 U.S.C. § 933(a)(1) and (b) –  
Trafficking Firearms

18 U.S.C. §§ 922(g)(1) and 924(a)(2)  
Felon in Possession of a Firearm

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned  
Complainant, being duly sworn, deposes and states:

**COUNT ONE**

*Engaging in the Business of Dealing Firearms Without a License*  
(18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D))

Beginning from a time unknown but no earlier than February 13, 2023, and  
continuing up to and including March 16, 2023, in the State and Federal District of  
Nevada,

**ADRIEN TYRIE MACKLIN-HICKS,**  
**aka "Drae,"**

defendant herein, not being a licensed dealer, importer, and manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the business of dealing in, importing, and manufacturing firearms, all in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

**COUNT TWO**  
*Trafficking Firearms*  
(18 U.S.C. §§ 933(a)(1) and (b))

Beginning from a time unknown but no earlier than February 13, 2023, and continuing up to and including on or about March 16, 2023, in the State and Federal District of Nevada,

**ADRIEN TYRIE MACKLIN-HICKS,**  
**aka "Drae,"**

defendant herein, knowingly transferred and disposed of firearms to another person, in or affecting interstate or foreign commerce, knowing or having reasonable cause to believe that the use, carrying, and possession of said firearms by the recipient would constitute a felony, as defined in 18 U.S.C. § 932(a), all in violation of Title 18, United States Code, Section 933.

**COUNT THREE**  
*Felon in Possession of a Firearm*  
(18 U.S.C. §§ 922(g)(1) and 924(a)(2))

Beginning from a time unknown but no earlier than February 13, 2023, and continuing up to and including on or about March 16, 2023, in the State and Federal District of Nevada,

**ADRIEN TYRIE MACKLIN-HICKS,**  
**aka "Drae,"**

defendant herein, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: *Felon in Possession of a Firearm*, on or about December 19, 2018, in the Federal District of Nevada under case number 2:17-cr-00396-JCM-VCF; and *Attempted Robbery*, on or about October 10, 2016, in the Eighth Judicial District Court of Nevada, under case number C-16-315866-1; knowingly possessed a firearm, to wit: a Spike's Tactical, Model ST-15, multi-caliber AR-style firearm, bearing serial number SS028211; a Glock, Model, 19 Gen 5, 9MM pistol, bearing serial number BZBX475; a Glock, Model 19 Gen 5, 9MM pistol, bearing serial number BZBY033; an Ares Defense (Fightlite Industries), Model SCR, .556 caliber AR-style pistol bearing serial number AFL-001586; a ROMARM/CUGIR, Model Micro Draco, .762 caliber pistol, bearing serial number ROA 22 PMD-38603; and an F.N. (FN HERSTAL), Model Five-Seven, 5.7x28 caliber pistol, bearing serial number 386205776; said possession being in and affecting interstate commerce and said firearms having been shipped and transported in interstate commerce, all in violation of Title 18, United States Code, Sections §§ 922(g)(1) and 924(a)(2).

### **PROBABLE CAUSE AFFIDAVIT**

Your Complainant, Brittany Nimmo, as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), states the following as and for probable cause:

1. Your Complainant is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), a component of the United States Department of Justice, and has been so employed since December of 2020. Your Complainant is currently assigned to the ATF Las Vegas Group II Crime Gun Intelligence Task Force.

1           2.       The following information contained within this criminal complaint is  
2 based upon your Complainant's participation in this investigation as well as information  
3 and reports provided to me by other law enforcement personnel. This statement does not  
4 include all information in reference to this investigation, but rather only those facts  
5 necessary to establish probable cause. All times are approximate.

6                               **FACTS ESTABLISHING PROBABLE CAUSE**

7           3.       On or about February 13, 2023, an ATF Confidential Informant (hereinafter  
8 "CI-1")<sup>1</sup> contacted your Complainant and provided information that he/she believed that  
9 a person by the name of "Drae," later identified as ADRIEN TYRIE MACKLIN-HICKS,  
10 was selling firearms in the Las Vegas, Nevada area. CI-1 stated he/she had known "Drae"  
11 for approximately six months. CI-1 informed your Complainant that he/she had  
12 knowledge that "Drae" was a convicted felon based upon previous conversations with  
13 MACKLIN-HICKS, as well as a mutual incarcerated friend who knows both CI-1 and  
14 MACKLIN-HICKS. CI-1 informed investigators that he/she obtained "Drae's" phone  
15 number through Instagram messenger in or around the month of December 2022. CI-1  
16 provided investigators with "Drae's" cell phone number: (725) 710-6697 (hereinafter  
17 "TT-1"). CI-1 also sent a screenshot of MACKLIN-HICKS' Facebook page with the  
18 username of "Drae Hunnid" to investigators. CI-1 also provided agents with a screen  
19 capture from the "Drae Hunnid" Facebook account of a video story of an AR style  
20 firearm with a thin blue line flag that appeared to be tan/black in color.

21  
22 \_\_\_\_\_  
23           <sup>1</sup> CI-1 has worked for the ATF as an official confidential information in exchange  
24 for cash payment for approximately two years. CI-1's information has proven reliable in  
the past on several investigations. CI-1 has arrests for Domestic Battery and Displaying  
Fictitious Registration, but no convictions appear on CI-1's criminal background.

1           4.     Your Complainant conducted an open-source check of TT-1 and learned  
2 MACKLIN-HICKS was associated with the phone number.

3           5.     ATF agents then conducted National Crime Information Center (“NCIC”)  
4 queries of MACKLIN-HICKS’ criminal history and located the following felony  
5 convictions:

6               a.     On or about December 19, 2018, MACKLIN-HICKS was convicted  
7                       of *Felon in Possession of a Firearm*, in violation of 18 U.S.C.

8                       § 922(g)(1), under case number 2:17-cr-00396-JCM-VCF, in the  
9                       United States District Court of Nevada. MACKLIN-HICKS is  
10                      currently on Federal Supervised Release which is set to expire in  
11                      June 2023.

12              b.     On or about October 10, 2016, MACKLIN-HICKS was convicted  
13                       for *Attempted Robbery*, in violation of NRS 100.380 and 193.330,  
14                       under case number C-16-315866-1, in the Eighth Judicial District  
15                       Court of Nevada.

16           6.     Your Complainant conducted a Nevada Department of Motor Vehicles  
17 (DMV) check for MACKLIN-HICKS and reviewed the Nevada DMV photograph of him  
18 that was captured on or about January 13, 2022.

19           7.     Your Complainant then contacted CI-1 and showed CI-1 the DMV photo of  
20 MACKLIN-HICKS. CI-1 identified MACKLIN-HICKS as the person he/she knew to be  
21 “Drae.”

22           8.     On or about February 14, 2023, the ATF and LVMPD conducted a  
23 controlled purchase operation of one (1) Spike’s Tactical, ST-15, multi-caliber AR-style  
24 firearm, bearing serial number SS028211, from MACKLIN-HICKS involving CI-1 and an

1 additional CI (hereinafter "CI-2").<sup>2</sup> The operation occurred in Las Vegas, Nevada.<sup>3</sup> The  
2 details of the controlled purchase were gathered through surveillance, CI debriefs, and a  
3 review of electronic surveillance footage. The controlled purchase was video and audio  
4 recorded. Below is a summary of the controlled purchase operation:

5           a.       At approximately 12:03 p.m., investigators observed MACKLIN-  
6 HICKS entering the rear passenger seat of the CI vehicle. MACKLIN-HICKS, CI-1, and  
7 CI-2 engaged in conversation, and discussed the price of the firearm. Upon agreement of  
8 price, CI-2 counted out \$1,500 of previously documented agent cashier funds in exchange  
9 for the aforementioned firearm. CI-2 informed MACKLIN-HICKS that he/she takes the  
10 firearms to California. During the controlled purchase operation, MACKLIN-HICKS  
11 stated, "I just got out the feds for doin' all that shit." At approximately 12:05 p.m.,  
12 MACKLIN-HICKS exited the CI vehicle, re-entered his car and the CIs departed from the  
13 meet location.

14           9.       On or about March 1, 2023, the ATF and LVMPD completed a controlled  
15 purchase operation of two (2) Glock 19, Gen 5, 9mm caliber pistols, bearing serial  
16 numbers BZBX475 and BZBY033, and one (1) Fightlite SCR, .556 caliber AR-style pistol  
17 bearing serial number AFL-001586, from MACKLIN-HICKS involving CI-2 and an ATF  
18 undercover agent (hereinafter "UC"). The operation occurred in Las Vegas, Nevada.<sup>4</sup>  
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20           <sup>2</sup> CI-2 has been working for ATF for approximately over two months. Prior to  
21 working as an ATF informant, CI-2 worked as a confidential informant for the Bakersfield  
22 Police Department (PD) in California. CI-2's information has proven reliable in the past  
23 while working for Bakersfield PD. CI-2 has several arrests for robbery, driving violations,  
24 felon in possession of firearm, and battery offenses. CI-2 was convicted in 2017 for  
Possession of a Firearm by a Felon.

<sup>3</sup> The full address is known to the investigators.

<sup>4</sup> The full address is known to the investigators.

1 The details of the controlled purchase were gathered through surveillance, CI debriefs, UC  
2 reporting, and a review of electronic surveillance footage. The controlled purchase was  
3 video and audio recorded. Below is a summary of the controlled purchase operation:

4           a.       At approximately 2:06 p.m., investigators established surveillance at  
5 the meet location. At approximately 2:24 p.m., investigators observed MACKLIN-  
6 HICKS arrive at the meet location in his car, exit his car and enter the CI vehicle in the  
7 front passenger seat. MACKLIN-HICKS took out the three firearms and showed them to  
8 CI-2 and the ATF UC. Upon agreement of price, CI-2 provided MACKLIN-HICKS with  
9 \$1,000 of previously documented agent cashier funds for the Glock 19 bearing serial  
10 number BZBX475. The ATF UC then proceeded to count out \$2,800 of previously  
11 documented agent cashier funds and provided it to MACKLIN-HICKS in exchange for  
12 the Glock 19 bearing serial number BZBY033 and the Fightlite SCR bearing serial  
13 number AFL-001586. At approximately 2:41 p.m., MACKLIN-HICKS exited the CI  
14 vehicle and went back to the MACKLIN-HICKS' VEHICLE, departing shortly  
15 thereafter.

16           10.     On or about March 10, 2023, the ATF completed a controlled purchase  
17 operation of one (1) Micro-Draco 7.62 pistol, bearing serial number ROA 22 PMD-38603,  
18 one (1) FN Five-Seven, 5.7 pistol bearing serial number 386205776, and one (1) suspected  
19 MCD from MACKLIN-HICKS involving CI-2 and the ATF UC. The operation occurred  
20 in Las Vegas, Nevada.<sup>5</sup> The details of the controlled purchase were gathered through  
21 surveillance, CI debriefs, UC reporting, and a review of electronic surveillance footage.

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23  
24 <sup>5</sup> The full address is known to the investigators.



1 The controlled purchase was video and audio recorded. Below is a summary of the  
2 controlled purchase operation:

3           a.       At approximately 2:11 p.m., the ATF UC and CI-2 arrived at the  
4 meet location. MACKLIN-HICKS exited the front driver side door of his car and entered  
5 the CI car. MACKLIN-HICKS handed two firearms and a suspected machinegun  
6 conversion device to CI-2 and the ATF UC. CI-2 then counted out \$2,300 in previously  
7 recorded ATF funds and handed it MACKLIN-HICKS in exchange for the FN 5.7 pistol  
8 bearing serial number 386205776. The ATF UC then handed \$2,700 in previously  
9 recorded ATF funds to MACKLIN-HICKS in exchange for the suspected MCD and  
10 Micro-Draco 7.62 pistol bearing serial number ROA 22 PMD-38603.

11           11.     A Federal Firearms Licensee (FFL) database query was conducted of  
12 MACKLIN-HICKS. The query resulted in MACKLIN-HICKS not having, nor did he  
13 ever have, a Federal Firearms License to engage in the business of dealing firearms.

14           12.     Your Complainant has consulted with a Special Agent and interstate nexus  
15 expert from the ATF and learned that all of the firearms identified herein were  
16 manufactured outside of the State of Nevada and, therefore, were shipped and transported  
17 in interstate commerce in order for them to be in MACKLIN-HICKS possession in the  
18 state and federal district of Nevada.

19           13.     The suspected MCD purchased on or about March 10, 2023, is pending an  
20 ATF Firearms Technology Criminal Branch examination for a machinegun  
21 determination.

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**CONCLUSION**

14. Based upon the foregoing facts and information, your Complainant respectfully submits that there is probable cause to believe that ADRIEN TYRIE MACKLIN-HICKS committed the offenses of 18 U.S.C. § 922(a)(1)(A), *Dealing, Importing, or Manufacturing a Firearm Without a License*, 18 U.S.C. § 933(a), *Trafficking in Firearms*, and 18 U.S.C. § 922(g)(1), *Felon in Possession of a Firearm*.



Special Agent Brittany Nimmo  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 16th day of March, 2023.



HONORABLE DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

